

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT of Maryland
Greenbelt**

IN RE

Tamara R. Owens

Case No. **20-11765**
Chapter 13

Debtor

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, CSMC 2019-JR1 Trust, by Counsel, and for its Objection to Confirmation of the Chapter 13 Plan filed by the debtor states as follows:

1. The bank is a secured creditor of the debtor pursuant to a Deed of Trust dated March 5, 2007 which secures a Mortgage Note to real property of the Debtors located at 6125 Silver Leaf Lane, Forestville, MD 20747.
2. As of the date of filing, the lender was owed approximately \$42,257.61 of which approximately \$8,101.45 are the pre-petition arrears.
3. The Debtor's Plan proposes to pay a total of \$0.00 for the pre-petition arrears.
4. Creditor objects as the plan fails to treat or list creditor's claim.
5. The Plan does not comply with 11 U.S.C. Section 1325, in that it does not pay the Movant, its pre-petition arrearage claim.

WHEREFORE, the Movant respectfully requests that Confirmation of the Chapter 13 Plan submitted by the Debtors herein be denied, and for any other relief the Court deems necessary.

Respectfully Submitted,

MARK MEYER
MD BAR 15070
ROSENBERG & ASSOCIATES, LLC
4340 East West Highway
SUITE 600
BETHESDA, MARYLAND 20814
301-907-8000

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/s/ Mark D. Meyer, Esq.

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FOR THE DISTRICT OF MARYLAND
Located in Greenbelt

IN RE

TAMARA R OWENS

Debtor

Case No. 20-11765-TJC
Chapter 13

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of February, 2020, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Objection to Plan will be served electronically by the Court's CM/ECF system on the following:

Rowena Nicole Nelson, Esquire

Rebecca A Herr, Trustee

I hereby further certify that on the 13th day of February, 2020, a copy of the Objection to Plan was also mailed first class mail, postage prepaid to:

Tamara R Owens
7134 Britens Way
Brandywine, MD 20613

Respectfully Submitted,

/s/ Mark D. Meyer, Esq.
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Rosenberg & Associates, LLC
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